

March 11, 2008

RE: Final Environmental Assessment (EA) for Richards Development Company's Richards Pit Amendment Application to Extend the Date of Final Reclamation

To All Interested Parties:

In response to the public notice and Draft EA that DEQ issued in January 2008 on this proposal, DEQ received a few public comments regarding the application of private covenants to the property on which the operation is located. DEQ has addressed these comments in the enclosed copy of the Final EA, which is also available at <http://www.deq.mt.gov/ea/opencut.asp>.

If any person wishes to challenge DEQ on the Final EA for this proposed amendment to Richards Development Company's Richards Pit amendment application, he or she may do so as follows. The Montana Environmental Policy Act, which provides for the legal authority and basis for the preparation of EA's and environmental impact statements by state agencies, states at 75-1-201(6), MCA: "A challenge to an agency action under this part may only be brought against a final agency action and may only be brought in district court or in federal court, whichever is appropriate. Any action or proceeding challenging a final agency action alleging failure to comply with or inadequate compliance with a requirement under this part must be brought within 60 days of the action that is the subject of the challenge."

DEQ has determined that Richards Development Company's Richards Pit amendment application is in compliance with the applicable provisions of the Opencut Mining Act and its pursuant rules. Therefore, DEQ is concurrently approving this amendment application.

Regarding DEQ approval of the amendment application, the Opencut Mining Act at 82-4-427, MCA provides: "(1) A person whose interests are or may be adversely affected by a final decision of the department to approve or disapprove a permit application and accompanying material or a permit amendment application and accompanying material under this part is entitled to a hearing before the board [of Environmental Review] if a written request stating the reasons for the appeal is submitted to the board within 30 days of the department's decision. ... (4) The contested case provisions of the Montana Administrative Procedure Act, Title 2, chapter 4, part 6, apply to a hearing held under this section." Requests for a hearing under this provision must be submitted to: Secretary; Board of Environmental Review; P.O. Box 200901; Helena, MT 59620-0901.

Please contact Rod Samdahl in DEQ's Kalispell office (755-8985, Ext. 101 or rsamdahl@mt.gov) or me if you have any questions.

Sincerely,

Neil Harrington, Chief
Industrial and Energy Minerals Bureau
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E-mail: neharrington@mt.gov

NH/nh
Enclosure

**DEPARTMENT OF ENVIRONMENTAL QUALITY
OPENCUT MINING PROGRAM**

**FINAL SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT
March 11, 2008**

Proponent: Richards Development Company
Site Name: Richards Pit
Legal: S2 NE4 Section 14, T16N, R15W
County: Missoula
Permit #: 00524

Type and Purpose of Action: The applicant has proposed to extend the date of final reclamation from the year 2030 to 2060, an additional 30 years. This extension would not increase the volume of material that can be removed from the site, nor would any other changes be made to this mining permit. The life of the mine would be extended, but all other aspects of the operation would remain the same. The attached map below shows the existing boundaries of the permit and the approximate contours of the site at the time of final reclamation.

Potential Impacts and Mitigation: It is expected that impacts associated with this proposal will mimic those identified in the original EA dated April 1994 and supplemented in February 2004. These two documents can be found on the DEQ website at <http://www.deq.mt.gov/ea/opencut.asp>.

Public involvement and comments: The availability of this EA was advertised in the Missoulian newspaper on January 21 and 22, 2008 and in the Seeley Swan Pathfinder, a local weekly newspaper circulated in the area, on January 24. The EA was posted on the DEQ website and comments were accepted through February 1, 2008. DEQ received comments from three parties.

Comments received were focused on disputing the operator's legal right to mine and operate facilities at this location, with respect to the Double Arrow Ranch Landowners Association's private covenants, which are alleged to prohibit this operation of the Richards Development Company. DEQ is not a party to the private covenants on the land at issue and has no standing to enforce them. In addition, covenants may be waived or otherwise rendered unenforceable under certain situations, and DEQ does not have the authority to investigate and make an independent evaluation of the legality and enforceability of private covenants. If someone with authority to enforce the covenants were to take the matter to court and obtain a final judgment holding that one or more private covenants effectively bar(s) this opencut operation in part or in full, the Department would then be obligated to act accordingly.

The comments included the assumption that the concrete and asphalt plants that Richards Development Company operates on the property are included in the mining permit. That was true until February 2004, at which time DEQ released these facilities from the permit area as reclaimed commercial area.

Prepared by: Rod Samdahl and Neil Harrington

JOHN RICHARDS
MILEPOST 12 SITE
S1/2 NE1/4 SEC 14
T16N, R16W
MISSOURI COUNTY
AMENDMENT #7
SEPTEMBER 6, 2006
12 ACRES

DOUBLE ARROW RANCH

MDOT
Facility

MT HWY 83

0 500
SCALE IN FEET

access road

visual barrier

office

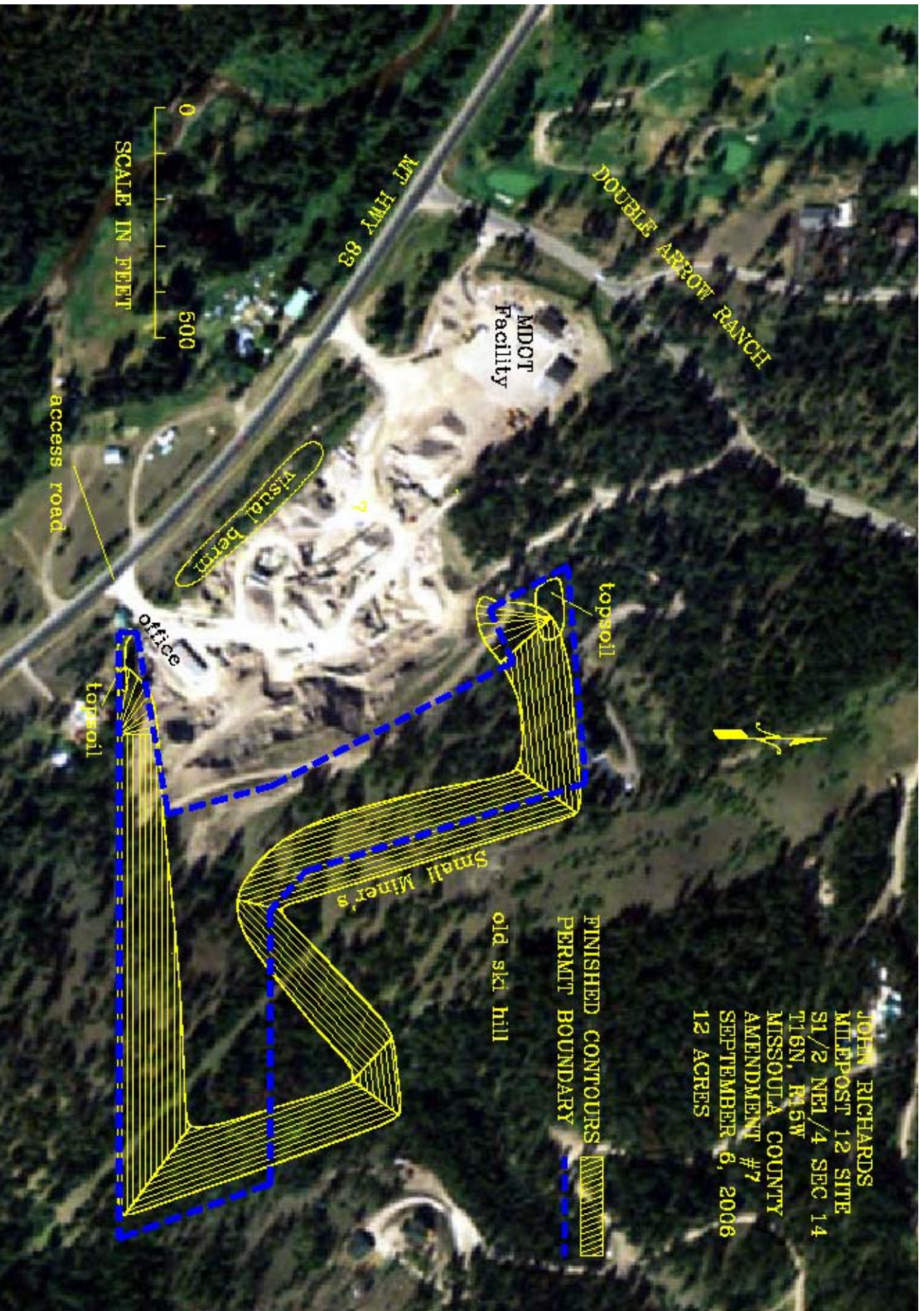
topsoil

topsoil

Small Miner's

old ski hill

FINISHED CONTOURS
PERMIT BOUNDARY



ENVIRONMENTAL ASSESSMENT

PROPONENT: Richards Development Company

PROJECT NAME: Opencut Gravel Mining – Richards Pit (Seeley Lake) Site

LOCATION: S½ NE¼ Section 14, T16N, R15W **COUNTY:** Missoula

PERSON PREPARING EA: Rod Samdahl

E.A. COMPLETED: 2/9/04
(Date)

TYPE AND PURPOSE OF ACTION:

The applicant proposes to provide a new map, move his mining area easterly, delete some reclaimed area, change the completion date, expand the Opencut Mining permit to include some of the old Small Miner's Exclusion area, set a new bond amount and continue the plan to mine as outlined in the August, 2000 Cutslope Study prepared by Armstrong & Associates. The site would remain 12.0 acres in size, the total volume to be mined would be 1.5 Mcy, and would be reclaimed by December, 2030. The original Environmental Assessment was done in April, 1994.

				POTENTIAL IMPACTS		
	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
PHYSICAL ENVIRONMENT						
1. <u>TOPOGRAPHY</u>			X			
2. <u>GEOLOGY</u> ; Stability			X			
3. <u>SOILS</u> ; Quality, Distribution	X			X		Soils will be stripped and saved, and replaced only on the transition slopes after mining is finished.
4. <u>WATER</u> ; Quality, Quantity; Distribution			X			
5. <u>AIR</u> ; Quality			X	X		Some deterioration of air quality will occur.
6. <u>UNIQUE, ENDANGERED, FRAGILE, or LIMITED</u> environmental resources			X			
BIOLOGICAL ENVIRONMENT						
1. <u>TERRESTRIAL, AVIAN, and AQUATIC</u> ; species and habitats			X	X		Wildlife will be displaced.
2. <u>VEGETATION</u> ; Quantity, quality, species	X			X		The site will remain as an open rock face except on the sides where topsoil and vegetation will be replaced.
3. <u>AGRICULTURE</u> ; grazing, crops, production	X			X		Timber production will cease following reclamation.
				POTENTIAL IMPACTS		

	A	B	C	LONG TERM	SHORT TERM	AMPLIFICATION
HUMAN ENVIRONMENT						
1. <u>SOCIAL</u> ; structures and mores			X			Locals have seen this plan in operation for several years, this amendment doesn't change the plan.
2. <u>CULTURAL</u> ; Uniqueness, diversity			X			
3. <u>POPULATION</u> ; quantity and diversity			X			
4. <u>HOUSING</u> ; quantity and distribution			X			
5. <u>HUMAN HEALTH & SAFETY</u>			X			
6. <u>COMMUNITY & PERSONAL INCOME</u>			X			
7. <u>EMPLOYMENT</u> ; quantity and distribution			X			
8. <u>TAX BASE</u> ; local and state tax revenue			X			
9. <u>GOVERNMENT SERVICES</u> ; demand			X			
10. <u>INDUSTRIAL, COMMERCIAL</u> and <u>AGRICULTURAL</u> activities			X			
11. <u>HISTORICAL AND ARCHAEOLOGICAL</u>			X			
12. <u>AESTHETICS</u>			X			No change in existing plan.
13. <u>ENVIRONMENTAL PLANS</u> and <u>GOALS</u> ; local and regional			X			
14. <u>DEMANDS</u> on <u>ENVIRONMENTAL RESOURCES</u> of land, water, air and energy			X			
15. <u>TRANSPORTATION</u> ; networks and traffic flows			X			

A: Significant Unavoidable Impacts. B: Insignificant as a result of conditioned mitigation. C: Insignificant as proposed.

ALTERNATIVES CONSIDERED: Denial

PUBLIC INVOLVEMENT: None

OTHER GROUPS OR AGENCIES CONTACTED OR WHICH MAY HAVE OVERLAPPING JURISDICTION: None

REGULATORY IMPACT ON PRIVATE PROPERTY: None

RECOMMENDATION FOR FURTHER ENVIRONMENTAL ANALYSIS:

() EIS () MORE DETAILED EA (X) NO FURTHER ANALYSIS

INDIVIDUALS OR GROUPS CONTRIBUTING TO THIS EA: _____

Approved By

(Signature)

Date 2-9-04

PROPERTY DESCRIPTION: SW1/4NE1/4, Sec.14, T 16 N, R 15 W, Missoula County

COMPANY NAME: Richards
Development
Company

DATE: 2/9/04 PREPARED BY: Jerry Burke

PRIVATE PROPERTY ASSESSMENT ACT CHECKLIST

DOES THE PROPOSED AGENCY ACTION HAVE TAKINGS IMPLICATIONS UNDER
THE PRIVATE ASSESSMENT ACT?

YES	NO	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	2. Does the action result in either a permanent or indefinite physical occupation of private property?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	3. Does the action deprive the owner of all economically viable uses of the property?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	4. Does the action deny a fundamental attribute of ownership?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	5. Does the action require a property owner to dedicate a portion of property or to grant an easement? (If answer is NO, skip questions 5a and 5b and continue with question 6.)
<input type="checkbox"/>	<input type="checkbox"/>	5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
<input type="checkbox"/>	<input type="checkbox"/>	5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	6. Does the action have a severe impact on the value of the property?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally? (If the answer is NO, skip questions 7a-7c)
<input type="checkbox"/>	<input type="checkbox"/>	7a. Is the impact of government action direct, peculiar, and significant?
<input type="checkbox"/>	<input type="checkbox"/>	7b. Has the government action resulted in the property becoming practically inaccessible, waterlogged, or flooded?
<input type="checkbox"/>	<input type="checkbox"/>	7c. Has the government action diminished property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?

Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b.

If taking or damaging implications exist, the agency must comply with § 5 of the Private Property Assessment Act, to include the preparation of a taking or damaging impact assessment. Normally, the preparation of an impact assessment will require consultation with agency legal staff.

CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name: Milepost 12 Proposed Implementation Date: April 15, 1994
 Proponent: John Richards
 Type and Purpose of Action: The applicant proposes to amend his existing permit from 2 to 12 acres to expand the pit toward the north into a talus slope and rock outcrop. Under the planned amendment, the operator will mine and/or crush 750,000 cubic yards of gravel from a pit located 3 miles south of the town of Seeley Lake over the life of the mine. The operation is currently under way and the operator is requesting the amended acreage as of September 15, 1994. A topsoil berm will be left to provide visual and sound barriers for the highway. The mine will leave a level bottomed commercial lot with a 60 to 70 foot rock and talus highwall when completed. The transition slopes between the flat areas and the talus and outcrop slopes will be covered with topsoil and seeded with grasses.
 Location: SW $\frac{1}{4}$ NE $\frac{1}{4}$ Sec 14, T16N, R15W County: Missoula

N = Not present or No Impact will occur.

Y = Impacts may occur (explain under Potential Impacts).

IMPACTS ON THE PHYSICAL ENVIRONMENT	
RESOURCE	[Y/N] POTENTIAL IMPACTS AND MITIGATION MEASURES
1. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE: Are fragile, compactible or unstable soils present? Are there unusual geologic features? Are there special reclamation considerations?	<p>[Y] The proposed mine is located in a fairly narrow, confined river fault-block valley between two major mountain ranges. The deposit is composed of stratified layers of sand and gravel overlain by a layer of silty sandy loam topsoil left from retreating continental glaciers around 10,000 years ago and re-worked by the Clearwater. Tertiary sediment fills the bottom of the valley and the more recent Quaternary glacial debris forms a layer on the surface. The river sands and gravel are plastered up against talus that spills down from the outcrop above.</p> <p>The billion year old Precambrian rock of the Belt Series limestone and quartzite rocks surround the deposit in towering walls of the Mission Mountains to the west and the Swan Mountains to the east. The upper elevations of the mountains were dramatically sculpted by alpine glaciers. The Swan River Valley was formed as the limestone rock was tilted eastward and block faulted down the middle of the present valley.</p> <p>Up to ten inches of topsoil and up to four feet of overburden will be salvaged and stockpiled along the highway for a buffer to highway traffic. Local terrace slopes demonstrate reasonably good stability with native soils. Following mining, the topsoil will be replaced, disked and seeded along the transition from the pit floor to the rock wall to stabilize the soil and prevent erosion. Microbes will re-colonize the soil on the slopes. The rocky slopes cannot be reclaimed and will leave a permanently altered landscape and the pit floor will be left as a commercial site.</p>
2. WATER QUALITY, QUANTITY AND DISTRIBUTION: Are important surface or groundwater resources present? Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality?	<p>[Y] High groundwater is near the pit floor but mining will leave the floor at least three feet above the high water table. Except for fuel and lubricants in mobile tanks and equipment working in the pit, all fuel and other potential water contaminants will be stored out of the mine site. All spills will be excavated and removed immediately. The nearest surface waters are Morrell Creek and the Clearwater River whose confluence is approximately 700 feet south of the mine. The creek and river are located across Highway 83 and should not be affected by the mine.</p>

CHECKLIST EA

<p>3. AIR QUALITY: Will pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I airshed)?</p>	<p>[Y] Crushers, screens and trucking equipment typically cause dusty conditions in disturbed soil sites. Air quality will be monitored and protected as necessary, and as committed to by the applicant. An air quality permit will be required and must be secured from Missoula County. This permit would require, as a minimum, that the spray bars be utilized when opacity exceeds 15%; generally described as the amount visually perceptible. Compliance would be monitored through routine inspections and/or in response to public requests. This is likely to be adequate to prevent significant amounts of particulate matter from blowing off site. Water bars, road watering and other dust controls will be used as necessary.</p> <p>Asphalt production also degrades the air quality but the operator must obtain air quality permits and abide by state air quality regulations if such equipment is used. Asphalt production is not proposed within this application. However, if it were, the applicant would be required to abide by 40 CFR Part 60, Subpart I, which sets particulate and opacity limitations on emissions from the asphalt plant. The particulate limitation must be verified by performance (stack) testing. The odor emanating from the plant would be noticeable and offensive to some.</p>
<p>4. VEGETATION COVER, QUANTITY AND QUALITY: Will vegetative communities be permanently altered? Are any rare plants or cover types present?</p>	<p>[Y] Native vegetation will be removed and will not be replaced except in the transition areas between the pit floor and the rocky slopes. Transition areas will be planted with species compatible with the proposed reclaimed use. Some native seed will remain viable in the salvaged topsoil and will re-generate. Under ideal conditions, native species from undisturbed, adjacent land will re-invade the topsoiled areas of the site.</p>
<p>5. TERRESTRIAL AVIAN AND AQUATIC LIFE AND HABITATS: Is there substantial use of the area by important wildlife, birds or fish?</p>	<p>[N] The general area sustains populations of deer, bears, grouse, rodents, birds, insects and various other animal species. The mine site is frequented by those animals and they will be displaced as the mine expands. Human use of this area has increased with the location of the MDOT maintenance facility and the entrance to the Double Arrow golf/restaurant complex. The proposed mine is not expected to significantly degrade wildlife populations.</p>
<p>6. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES: Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Species of special concern?</p>	<p>[N] The Natural Heritage Program and site evaluations have not revealed any endangered or threatened plant or animal species.</p>
<p>7. HISTORICAL AND ARCHAEOLOGICAL SITES: Are any historical, archaeological or paleontological resources present?</p>	<p>[N] A surface reconnaissance and literature search through SHPO did not discover any cultural, historical or archeological resources.</p>
<p>8. AESTHETICS: Is the project on a prominent topographic feature? Will it be visible from populated or scenic areas? Will there be excessive noise or light?</p>	<p>[Y] There will be a permanent deterioration of aesthetics along the Swan Highway as a result of the operation. Reclamation will somewhat minimize the visual impact of this change in land use. The visual barrier made from topsoil will reduce sight and sound impacts somewhat during mining. Seeding the berm and the final transition areas from the pit floor to the rock slopes will also lessen the short and long term visual impact.</p>
<p>9. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY: Will the project use resources that are limited in the area? Are there other activities nearby that will affect the project?</p>	<p>[N]</p>
<p>10. IMPACTS ON OTHER ENVIRONMENTAL RESOURCES: Are there other studies, plans or projects on this tract?</p>	<p>[Y] The Double Arrow Ranch is adjacent to the site and parcels of the Drew Creek Addition, Phase VII of the Double Arrow Ranch Subdivision are within the application area. Covenants governing development of these tracts exist and mining of gravel is specifically allowed. Further, the land may only be reclaimed to Recreational Vehicle storage.</p>
<p>IMPACTS ON THE HUMAN POPULATION</p>	
<p>RESOURCE</p>	<p>[Y/N] POTENTIAL IMPACTS AND MITIGATION MEASURES</p>

CHECKLIST EA

<p>11. HUMAN HEALTH AND SAFETY: Will this project add to health and safety risks in the area?</p>	<p>[Y] Truck traffic will access the proposed site directly from Highway 83, and the point chosen offers good sight visibility from both directions. The applicant may enter the Double Arrow road directly through the MDOT facility only when hauling to the Double Arrow development. The number of trucks entering and departing the site would not increase significantly the number of trucks which have historically hauled materials from the existing and previous operations, but would extend the period of use by approximately ten years. There could be periods of increased use in response to a specific project, but that would probably be short-termed, and it is assumed that the Montana Department of Transportation (MDOT) could require signs on either side of the access point warning of the truck traffic. Because the MDOT will be exiting from the Double Arrow Ranch road, the cumulative traffic will not increase at that point.</p> <p>Noise will not increase from the present operation which does generate significant noise when the crusher is active; noise levels are generally within the range of 60 to 90 decibels measured on site, decreasing with distance. However, the proposed location of the crusher would be within the "amphitheater" created by mining, and significant noise would be absorbed by the gravel walls on all but the southwest side. On that side, the vegetated topsoil berm would create the same type of effect. (see Table 1)</p> <p>The site is currently fenced and signed to restrict unauthorized access.</p>
<p>12. INDUSTRIAL, COMMERCIAL AND AGRICULTURAL ACTIVITIES AND PRODUCTION: Will the project add to or alter these activities?</p>	<p>[Y] The acreage listed in the Type and Purpose of Action will be taken permanently out of wildlife habitat and put into industrial/commercial use.</p>
<p>13. QUANTITY AND DISTRIBUTION OF EMPLOYMENT: Will the project create, move or eliminate jobs? If so, estimated number.</p>	<p>[N]</p>
<p>14. LOCAL AND STATE TAX BASE AND TAX REVENUES: Will the project create or eliminate tax revenue?</p>	<p>[N] Concern has been voiced that expansion of the existing operation would cause a reduction in market and therefore, taxable values of properties within the Double Arrow Ranch complex. Communication with the Missoula County Assessors office, and the State of Montana Tax Appeal Board however verified there has not been a reduction in taxable value directly related to the presence of a nearby sand and gravel operation. There remains the possibility that a successful appeal of an affected property could in fact reduce taxable values, however the reclamation plan submitted with this application proposes mitigation measures, such as dust control, visual barriers, and noise reduction based on crusher location, that should reduce impacts to land which may be affected by the operation. In addition, those affected lands not included under the Small Miner Exclusion Statement will be reclaimed so they are suitable for a productive use. It is possible that sales price of affected lots and those adjacent to them may be temporarily depressed.</p>
<p>15. DEMAND FOR GOVERNMENT SERVICES: Will substantial traffic be added to existing roads? Will other services (fire protection, police, schools, etc) be needed?</p>	<p>[Y] The operation will require periodic site evaluations by DSL staff. However, these evaluations are usually performed in conjunction with other area operations.</p>
<p>16. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS: Are there State, County, City, USFS, BLM, Tribal, etc. zoning or management plans in effect?</p>	<p>[Y] County zoning clearance has been obtained. The area is generally under development for recreational, residential and commercial use. The Double Arrow Ranch golf and residential development, and the promotion of the State Scenic Highway Program are indications that the area is being developed with resort/recreational use in mind.</p> <p>The proposed expansion of the operation may not be within the intent of the Double Arrow Ranch restrictive covenants and specifically may be in conflict with recreational easements, property setback requirements, visual screening requirements, and use restrictions. These impacts may be of valid concern to specific parties, but are beyond the scope of the Opencut Mining Act. The applicant has stated he has the right and power by legal estate owned, to mine the described lands. Any valid, private rights in conflict with this assertion can be privately enforced. The applicant has committed to maintaining the recreational easement in such a manner as to be passable by foot and horse traffic. In addition to the topsoil berm near the highway, vegetation will help screen the proposed operation from most view points.</p>

CHECKLIST EA

17. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES: Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract?	[Y] Access to recreational areas in the Clearwater State Forest, Lolo National Forest and private land are available through the application area. There is a recreational easement to provide access for hiking, horseback riding and snowmobiles in the winter through the permit area. This easement will be maintained in such a manner as to be passable by foot and horse traffic. The region surrounding the proposed expansion is being developed as a resort and scenic recreational area in conjunction with many of the historical uses such as logging and lumber production. Some people may regard this expansion as an eyesore that detracts from recreational or residential use of the area.
18. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING: Will the project add to the population and require additional housing?	[N]
19. SOCIAL STRUCTURES AND MORES: Is some disruption of native or traditional lifestyles or communities possible?	[N]
20. CULTURAL UNIQUENESS AND DIVERSITY: Will the action cause a shift in some unique quality of the area?	[N]
21. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:	[N]

22. Alternatives Considered:

No Action: Pit would not be permitted and impacts would not occur at this location. Aggregate would be hauled from a greater distance increasing fuel use, gaseous emissions and project costs.

23. Public Involvement, Agencies, Groups or Individuals contacted:

State Historic Preservation Office, Montana Heritage Program, State Department of Transportation. The Department of State Lands conducted a public meeting at Seeley Lake on September 8, 1994 to discuss the proposed expansion, the MEPA compliance document, and to solicit comments. Written comments were accepted through September 28, 1994, and several were received.

24. Other Governmental Agencies with Jurisdiction, List of Permits Needed:

Montana Department of Health and Environmental Science, Air Quality Bureau for Air Quality Permit and Water Quality Bureau for Stormwater Discharge Permit; Mine Safety and Health Administration for safety permit; Montana Department of Labor & Industry, Bureau of Safety for safety permit.

25. Magnitude and Significance of Potential Impacts:

Not Applicable. A finding of significance is relevant only to the requirement to prepare and EIS under MEPA. However, the statutory time constraints of the Opencut Mining Act preclude preparation of an EIS. Therefore, no such finding is necessary here.

Recommendation for Further Environmental Analysis:

☐ EIS ☐ More Detailed EA ☒ No Further Analysis

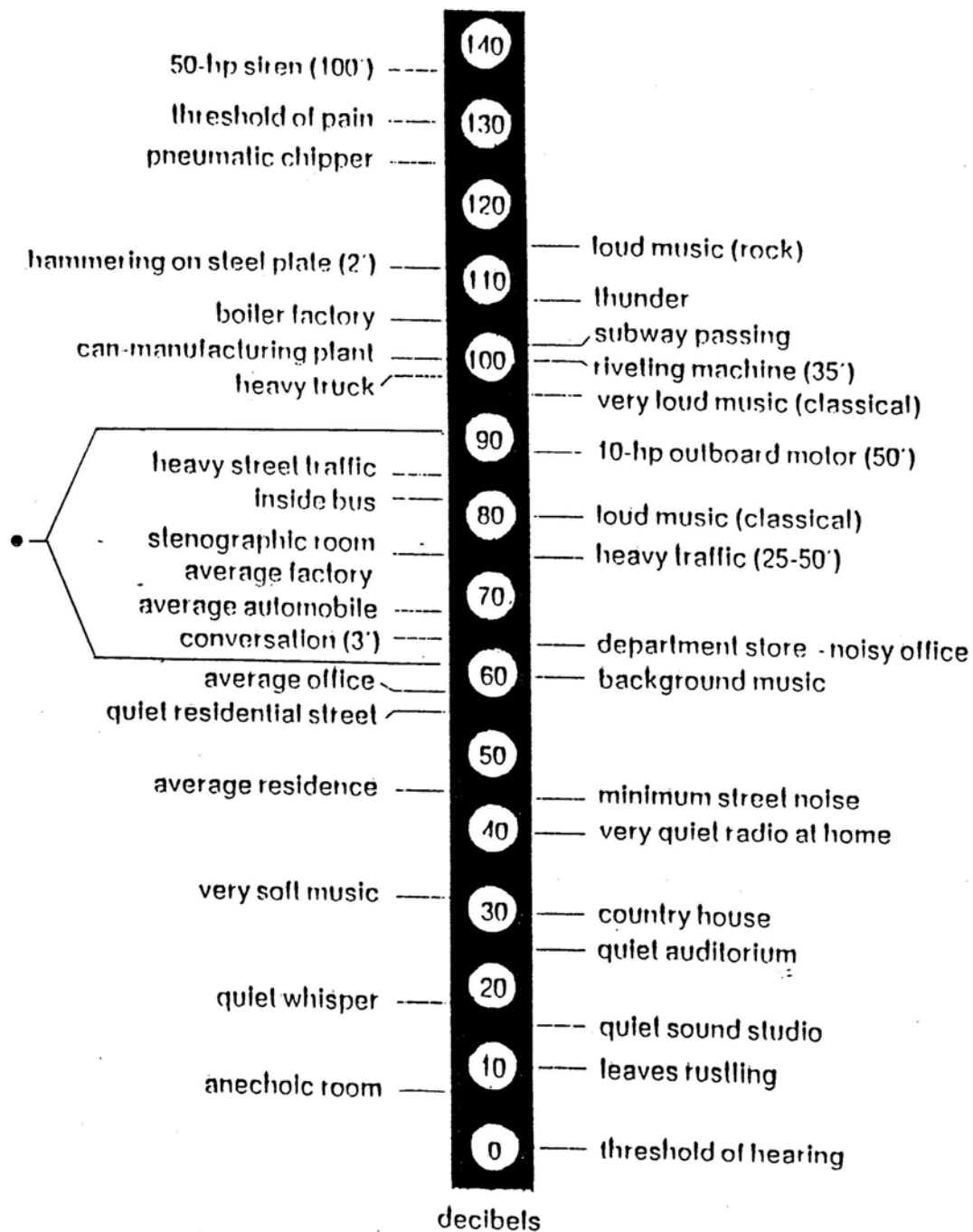
EA Checklist Prepared By: Rod Samdahl Reclamation Specialist
Name Title

Approved By: STEVE WELCH CHIEF, OPENCUT MINING BUREAU
Name Title

Steve Welch 10/31/94
Signature Date

Opencut

Revised, 2/25/92



● GRAVEL PIT IN FULL OPERATION MEASURED ONSITE

TABLE 1

SITE MAP #2

JOHN RICHARDS
 MILEPOST 12 SITE
 S1/2 NE1/4 SEC 14
 T16N. R15E
 MISSOULA COUNTY
 AMENDMENT #1
 OCTOBER 11, 1994

